IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CODING TECHNOLOGIES, LLC,	
Plaintiff,	**CASE NO. 3:20-cv-01001-L**
v.	**PATENT CASE**
SAMSONITE CORPORATION,	**JURY TRIAL DEMANDED**
Defendant.	

SAMSONITE'S RULE 12(b)(6) MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM

For the reasons set forth in Samsonite's Memorandum of Law in Support of Its Rule 12(b)(6) Motion to Dismiss For Failure to State a Claim, Samsonite LLC[1] respectfully moves for dismissal with prejudice of Plaintiff's claims of infringement of U.S. Patent No. 8,540,159 (the "'159 Patent"). The claims of the '159 Patent are directed to an abstract idea without claiming a specific unconventional mechanism for accomplishing it and thus fall short of claiming eligible subject matter under 35 U.S.C. § 101. Therefore, to avoid waste of judicial and party resources unnecessarily litigating an invalid patent, Samsonite requests that the Court dismiss Plaintiff's Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted.

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[1] Plaintiff incorrectly identifies as the named Defendant, "Samsonite Corporation," which was converted to Samsonite LLC, a Delaware limited liability company, on September 3, 2009.

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Dated: June 10, 2020

Respectfully submitted,

FISH & RICHARDSON P.C.

By: */s/ Neil J. McNabnay* _____
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing

document has been served on June 10, 2020, to all counsel of record who are deemed to have

consented to electronic service via the Court's CM/ECF system.

/s/ Neil J. McNabnay _____
Neil J. McNabnay